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Attorneys for Defendant
LINWEI DING

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LINWEI DING,

Defendant.

Case No. 3:24-CR-00141-VC

**DEFENDANT LINWEI DING'S WITNESS
LIST**

1 Pursuant to the Court's August 6, 2025, Order Granting Joint Stipulation to Modify
2 Deadlines and Set Pretrial Schedule (ECF 114), Defendant Linwei Ding ("Mr. Ding") hereby
3 submits the following list of witnesses he anticipates he may call at trial.

4 Mr. Ding has a constitutional right not to disclose any witness that he may call to rebut any
5 portion of the evidence that the government may present in its case, and the failure to disclose any
6 such witness in this filing is not a waiver of Mr. Ding's rights to call such witnesses and present
7 their testimony. U.S. Const. amend. V & VI. Mr. Ding furthermore reserves the right to call any
8 witness noticed by the government in its witness list.

9 Mr. Ding reserves his constitutional right to testify at trial in his own defense. Mr. Ding
10 may also seek to and reserves the right to supplement or modify this list before trial as his trial
11 preparations continue and to call additional witnesses at trial as may be necessary. In the event
12 such a decision is made, Mr. Ding shall inform the Court and prosecution of any such changes to
13 this list.

14 Without waiving the foregoing legal arguments, Mr. Ding hereby submits the following list
15 of witnesses who he anticipates he may call at trial:

- 16 1. Shruti Arora
- 17 2. Prashant Chandra
- 18 3. Yihua Ding
- 19 4. Odette Du
- 20 5. Mark Eskridge
- 21 6. Hany Farag
- 22 7. Brad Fuller
- 23 8. Yang Gao
- 24 9. Alireza Ghaffarkhah
- 25 10. Mingfeng Gong
- 26 11. Maya Haridasan
- 27 12. Smeeta Jalan
- 28 13. Norman Jouppi

1 14. Mazy Ma

2 15. Michael Maffei

3 16. Neil Martin

4 17. Aamer Mahmood

5 18. Isaac Pflaum

6 19. James Pooley

7 20. Jarek Przbylowicz

8 21. Kamran Shafiei

9 22. Wei Shen

10 23. Matt Sparks

11 24. Andy Swing

12 25. Mukarram Tariq

13 26. Kexin Yang

14 27. Xiao Zhang

15 28. Yanrui Zhang

16 29. Jiafan Zhu

17 30. In the absence of stipulations, Mr. Ding anticipates calling records custodian(s) for
18 Google, LLC.

19 31. Mr. Ding reserves the right to call all persons listed as inventors on the patents relied or
20 referenced in the expert report of Daniel Sanchez.

21 Dated: September 2, 2025

22 Respectfully submitted,

23 GOODWIN PROCTER LLP

24 By: /s/ Grant P. Fondo
25 DARRYL M. WOO (SBN 100513)
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7 Attorneys for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **September 2, 2025**. I further certify that all participants in the case are registered CM/ ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **September 2, 2025**.

/s/ Grant P. Fondo

Grant P. Fondo